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UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK
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Hearing Date: December 18, 2014
Hearing Time: 3:00 p.m.

In re:

Chapter 11

Conversion Consulting LLC now known as
Flip Services DBA Bounce and Flip,

Case No.: 14-12748-mg

Debtor.
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NOTICE OF MOTION FOR AN ORDER GRANTING RELIEF FROM STAY

TO: THE HONORABLE MARTIN GLENN
UNITED STATES BANKRUPTCY JUDGE

PLEASE TAKE NOTICE that 766 Tenth LLC, as creditor-landlord (“Landlord”), will move (the “Motion”) before the Honorable Martin Glenn, United States Bankruptcy Judge, at the United States Bankruptcy Court, the Alexander Hamilton Customs House, One Bowling Green, New York, New York 10004, on **December 18, 2014 at 3:00 p.m.**, or as soon thereafter as counsel may be heard, seeking entry of an order (the “Order”)¹ pursuant to 11 U.S.C. § 362 granting relief from the automatic stay to allow Landlord (1) to execute a pre-petition warrant of eviction against Debtor and (2) set-off Debtor’s security deposit, currently in possession of Landlord, against Landlord’s pre-petition and post-petition claims, and for such other and further relief as to the Court may seem just and proper.

PLEASE TAKE FURTHER NOTICE that pursuant to Rule 9006-1, Local Rules of Bankruptcy Practice for the Southern District of New York, answering papers and memoranda of

¹ A form of proposed order is annexed hereto as Exhibit F.

law, if any, must be filed with the Court and served upon the undersigned so as to be received by the undersigned no later than seven (7) days before the return date of this motion.

PLEASE TAKE FURTHER NOTICE that unless objections are timely filed and received by the Court, the Court may grant the relief requested herein.

PLEASE TAKE FURTHER NOTICE that the hearing may be adjourned from time to time without further notice other than the announcement of such adjournment in open court or by posting of such adjourned date on the Court's calendar on the aforementioned date.

PLEASE TAKE FURTHER NOTICE that you need not appear at the Hearing if you do not object to the relief requested in the Motion.

Dated: December 2, 2014
New York, New York

/s/ Warren S. Dank
Warren Dank, Esq. (WD3980)
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TO: Law Offices of Rachel S. Blumenfeld
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